Metropolitan King County Council

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Cheryle A. Broom

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MANAGEMENT LETTER

DATE: July 22, 2003

TO: Metropolitan King County Councilmembers

FROM: Cheryle A. Broom, County Auditor

SUBJECT: Groundwater Protection Program Review and Service Inventory

In September 2001, the Council adopted Ordinance 14214 establishing a Groundwater Protection Program (GPP) in King County. Section 6.B. of this ordinance named the King County Auditor to an oversight role, specifying that:

"The King County auditor shall review whether or not groundwater protection services are being provided by King County and provide to the King County council by July 2003 an inventory of groundwater protection services that are provided and are not provided by King County."

Pursuant to this oversight mandate, the 2003 Auditor's Office Work Program includes such a review. The purpose of this management letter is to summarize the results of this effort.

Overall, we found that the program appears to be offering services in line with its mandate, yet continues to face challenges, both financial and organizational, which may impede full implementation of the groundwater ordinance. While our mandate did not direct us to audit the performance of the program, we hope our inventory/review provides insight into the current state of the program and will facilitate future oversight efforts.

We appreciate the assistance provided by Groundwater Protection Program staff in conducting our review. We also appreciate the cooperation of Council staff in coordinating roles and objectives for this effort.

Methodology

Cooperation with Council Staff

Ordinance 14214, which created the Groundwater Protection Program, also established an oversight role for the Regional Water Quality Committee. The RWQC was asked "to make recommendations to the King County council between April and September 2003 on the efficacy of the groundwater protection program in King County." In addition, the Council's Utilities Committee has ongoing involvement with the GPP as it monitors the work of this program.

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In order to limit information requests, ease reporting for the agency, and make the most efficient use of legislative branch staff time, all parties agreed to work together and to meet these oversight and reporting needs through a single review effort.

Inventory

Ordinance 14214 contains several lists of activities which the Groundwater Protection Program was directed to include. One list defines the responsibilities of the County as a whole, including the Department of Development and Environmental Services (DDES), the Department of Public Health (DPH), and various divisions of the Department of Natural Resources and Parks (DNRP). A second list defines the responsibilities of DNRP as lead agency for GPP implementation.

The Auditor's Office, Council staff, and GPP staff agreed to use these two lists to develop an inventory of activity implementation. Activities were grouped as program staff have grouped them for annual reporting, and a status report for each activity was requested. Additional requests for clarification were made once responses were received. Our office has relied on the responses provided by GPP staff in assembling its inventory.

The activities list and summary status reports, grouped as described, are included in matrix form as an attachment to this letter.

Accomplishments

The program appears to have been most successful in supporting the groundwater management committees, collecting and managing data, and participating in policy discussion where groundwater is a concern.

- All groundwater management committees have been confirmed, have organized, and are meeting regularly with ongoing staff support.
- The GPP has developed a long-range vision for data collection and management with a countywide three-dimensional groundwater model as its ultimate goal.
- The GPP has participated in data collection projects such as the Sammamish River Valley Groundwater Study, ambient and water level sampling, a septic system distribution study, and preparations for a long-term water quantity and quality study on Vashon-Maury Island to start in 2004.
- GPP staff are participating in the Critical Areas Ordinance rewrite, Surface Water Design Manual revisions, preparation of King County Comprehensive Plan amendments, Water Resource Inventory Area (WRIA) planning, and regional water initiatives, ensuring that groundwater issues are taken into consideration.

Challenges

The program appears to have been less successful in resolving its funding constraints, developing work plans for groundwater management plan implementation, and coordinating efforts across agencies and jurisdictions.

• The GPP has not identified long-term funding for groundwater plan implementation. The program currently receives funding from the Solid Waste, Wastewater Treatment, and

Surface Water Management Funds, as well as from grants and the Rural Drainage Program. Much of this revenue was viewed as temporary when the program began. Though program staff have developed a set of funding options and have convened a stakeholder group to discuss them, no long-term strategy has been recommended. GPP staff hope to resolve this issue and include a funding proposal as part of the 2005 budget submittal.

- The GPP has not developed annual or three-year work plans as envisioned by the groundwater ordinance. The current annual plan is brief, in flux, and internal to DNRP. It does not include work activities for other agencies involved in groundwater protection. The three-year work plan is in draft form only and has not been reviewed by the groundwater protection committees. Differences regarding appropriate program emphasis, science, and future direction, as well as long-term funding uncertainties, appear to be complicating this effort and causing delays. GPP staff hope to overcome these differences with the assistance of their groundwater stakeholder group. This group consists of the chairs and vice-chairs of all four groundwater protection committees as well as representatives from the South King County Groundwater Management Area.
- The GPP does not have a standing interagency group to coordinate groundwater plan implementation across County agencies. While this is not specifically required by the groundwater ordinance, absence of such a group means coordination is ad hoc and must rely on GPP staff vigilance and requests for involvement. This situation may be due in part to funding constraints, as implementation activities without funding could receive lower priority. It also may be tied to differences over program focus and direction, as this could lead to confusion over responsibilities and roles.

In conclusion, while the groundwater protection program appears to be offering services in line with its mandate, ongoing oversight may be needed to ensure that current challenges are overcome.

David Reynolds, Management Auditor, conducted this review. Please contact him at 296-0369 or me at 296-1655 if you have any questions about the issues discussed in this letter.

CB:DR:yr Attachment

cc: Ron Sims, County Executive

Rod Brandon, Assistant County Executive

Kurt Triplett, Chief of Staff, Executive Office

Pam Bissonnette, Director, Department of Natural Resources and Parks

Alonso Plough, Director, Department of Public Health

Stephanie Warden, Director, Department of Development and Environmental Services

Dave Lawson, Executive Internal Audit Manager

Shelley Sutton, Policy Staff Director, County Council

Michael Alvine, Lead Legislative Analyst, County Council Labor Operations and Technology Committee

Megan Smith, Lead Legislative Analyst, County Council Utilities Committee Beth Mountsier, Lead Legislative Analyst, County Council Regional Water Quality Committee

KC Code Reference	Required Activity	Status of Activity	Providing Agency
Groundwater F	rotection Planning and Plan Implementation		
9.14.030(B)	Assist with updating groundwater management plans.	Each groundwater management plan has its own update schedule, and technically all are overdue. However, the groundwater protection committees have jurisdiction over this issue and must prioritize this work within a set of activities, including plan implementation. Other activities may be given higher priority by the committees.	DNRP
9.14.030(M)	Recommend any combination of activities, policies and procedures to public and private entities that have impacts on groundwater or that may be necessary to implement elements of the Groundwater Protection Program.	Groundwater issues are being addressed by proposed new regulations in the Critical Aquifer Recharge Area (CARA) component of the Critical Areas Ordinance (CAO) rewrite. Groundwater Protection staff, DDES, and Public Health also participate in administrative actions (e.g. permit review), legislative actions (e.g. King County Comprehensive Plan policy development), and interagency discussion (Interagency Groundwater Committee) where groundwater issues are considered. Private entities are participating on the groundwater protection committees.	DNRP, DPH, DDES
9.14.040	Support implementation of activities identified in the King County groundwater management plans that have been certified by the Washington State Department of Ecology.	Groundwater Protection staff assist with plan implementation in an ad hoc manner as they support the work of the groundwater protection committees. Ongoing work at Public Health and other agencies also supports plan implementation (e.g., enhanced well and septic system regulations). However, the Groundwater Protection Program as a whole lacks a clearly defined long-term funding structure for plan implementation. Without a clear picture of its future resources, the GPP has had difficulty developing a long-term implementation strategy for the plans.	DNRP, DPH
9.14.050(A.2)	Provide staff support to any groundwater protection committee appointed by King County and respond to the committees in a timely manner regarding the adoption of committee recommendations.	All four committees appointed by King County are functioning, and staff support is ongoing. Support includes scheduling meetings, recording and distributing meeting minutes, facilitating discussions, responding to requests, meeting with subcommittees, and assisting with plan implementation.	DNRP, DPH
9.14.120(A)	Develop model bylaws for governing the operations of a groundwater protection committee, which in turn shall be used by each committee in developing and adopting its own bylaws.	Vashon-Maury Island was the first committee to meet and develop bylaws. This was done with input from Groundwater Protection staff and the Prosecuting Attorney's Office. GP staff provided the VMI bylaws to the other committees as they began meeting. With minor modifications, versions of these bylaws have been adopted by all committees.	DNRP
9.14.130	In conjunction with the groundwater protection committees, identify individuals, groups, agencies, and elected officials with an interest in groundwater protection.	Groundwater Protection staff are assisting with outreach to stakeholders as they support the committees. An email list is in place, and maintenance of this list is ongoing. GP staff also have worked with Councilmembers Patterson, Edmonds, and Constantine on groundwater issues within their districts upon request.	DNRP

KC Code Reference	Required Activity	Status of Activity	Providing Agency
9.14.130	In conjunction with the groundwater management committees, keep interested parties informed of progress in implementation of certified groundwater management plans and King County's Groundwater Protection Program.	Groundwater Protection staff provide an overview of activities, accomplishments, and plan implementation with each annual report. This report is supplemented with individual reports specific to each groundwater management area as needed. The Program also posts information on its website.	DNRP, DPH
Data Collection	and Management		
9.14.030(A)	Obtain available data from other local jurisdictions in King County, federal and state agencies, and tribal nations.	In 2002, the Groundwater Protection Program obtained a water quality database from the state Department of Health containing 80,000 records reported by 1,882 water purveyors in King County between 1990 and 2002. The Program also received drillers' logs for water wells from the state Department of Ecology (DOE), locations of potential sources of groundwater contamination from DOE and the state Department of Natural Resources, and surface water elevation and flow data from the US Geological Survey. The Program also developed a geologic and hydrologic database for the Sammamish River Valley Groundwater Study in cooperation with the UW Center for Water and Watershed Studies. This database combined data from Bothell, Kenmore, Lake Forest Park, Redmond, Woodinville, Cross Valley Water District, Northshore Utility District, Seattle Public Utilities, state DOT, state DOE, and USGS. The database includes information from more than 6,000 soil borings, monitoring wells, and test pits, and has been used to develop cross sections describing the subsurface geology and groundwater flow systems in the Sammamish River Valley.	DNRP
9.14.030(A)	Review and map data.	Geographic data is available to the public through an internet portal using an interactive map program (iMAP). Data layers include drainage subbasins, water resource inventory areas, water service areas, wellhead protection areas, high groundwater contamination risk areas, groundwater management areas, Group A wells, Group B wells, all wells, groundwater quality sampling sites, lakes, rivers, and streams. The iMAP portal is linked to other County websites, including Groundwater Management, DDES, and King County Geographic Information Systems. Critical Aquifer Recharge Area maps also are being developed and will be made available with proposed Critical Areas Ordinance revisions.	

KC Code Reference	Required Activity	Status of Activity	Providing Agency
9.14.030(A)	Maintain a clearinghouse of data on groundwater in King County.	The Groundwater Protection Program manages data through the Solid Waste Division's database, EQuIS. This arrangement was selected in the early days of the program because much of the program's funding came from the SWD. However, GP staff indicate that EQuIS may not support all applications needed to achieve GP data management goals. In 2002, Groundwater Protection staff developed a data management plan. The plan's central, though long-term, objective is to develop a three-dimensional computer model simulating groundwater movement and quality throughout the county. Data inventory, collection, integration, and access would be key components in meeting this objective. GP staff are working to promote understanding of this vision and plan.	DNRP
9.14.030(A)	Respond to data requests.	Responding to data requests from the technical community and others about wells, water levels, or groundwater quality in a particular area is the primary way in which GP staff meet this obligation. According to GP staff, a newly hired staff person will focus on collection/ management/ dissemination of groundwater data.	DNRP, DPH
9.14.030(C)	Coordinate technical expertise in groundwater, including geology and hydrology; geophysics and geophysical methods; and mapping.	The 2002 Sammamish River Valley Groundwater Study examined the interaction between surface and groundwater flow levels and temperatures in the Sammamish Valley. This effort brought together technical expertise in geology, hydrology, and mapping. This project, as well as a proposed water quantity study on Vashon-Maury Island, may serve as a model for similar coordination as additional areas of the county are studied.	DNRP
9.14.030(D)	Track environmental benchmarks in accordance with King County's countywide planning policies.	Ambient groundwater monitoring (water quality) provides one data source used to address Environmental Indicator 15 - "Changes in groundwater levels and groundwater quality" - from the King County Benchmark Report. In 2001-2002, monitoring focused on three chemicals - arsenic, nitrates, and lead - which are considered the greatest concern for human health in King County. These were compared with the previous results (1989-1995). Most levels have stayed the same or dropped with the exception of nitrate levels on Vashon-Maury Island. This was compared with state Department of Health data for Group A public water systems during 1989-2002, which showed similar results. It is unclear how much trend data is available from recently developed areas of the county.	DNRP

KC Code Reference	Required Activity	Status of Activity	Providing Agency
		Groundwater level (water quantity) also was measured in approximately 50 wells. At least two measurements were taken at these sites in 2002 (similar to 2001) - and wells were located in a global positioning system to obtain a groundwater elevation estimation, needed to calculate direction of flow within an aquifer. Pre-January-1997 data was compared to post-January-1997 to establish a trend. Results were mixed, with average groundwater level increases in two groundwater management areas, and average decreases in the other two groundwater management areas. Because groundwater quantity experiences seasonal fluctuations, more frequent monitoring may be needed.	
9.14.030(E)	Sample groundwater at existing sampling sites on Vashon-Maury Island and in east King County.	Ambient groundwater monitoring (water quality) has been done for two consecutive years at 68 wells and springs in the four areas covered by the groundwater management plans. GP staff also have recruited and trained 25 Vashon-Maury Island residents to assist in gathering information on groundwater level (water quantity).	DNRP
9.14.030(E)	Establish/coordinate and monitor pilot groundwater sampling programs in incorporated and unincorporated areas of the county.	The 2002 Sammamish River Valley Groundwater Study is serving as a pilot study of surface water/groundwater interactions. A proposed 2004 Vashon-Maury Island water quantity study will serve as a pilot for developing "water budgets" for aquifers.	DNRP
9.14.030(I)	Identify and map critical groundwater recharge areas.	Critical Aquifer Recharge Area maps are being developed and will be made available with proposed Critical Areas Ordinance revisions.	DNRP
9.14.030(J)	Maintain a clearinghouse of groundwater models that address cross- jurisdictional groundwater problems within a groundwater management area or among groundwater management areas.	In 2002, GPP developed a data plan which establishes the long-term goal of developing a three-dimensional computer model simulating groundwater movement and quality throughout the county. As with other long-term program goals, uncertainty regarding future funding makes an implementation timeline difficult to establish. Sammamish River Valley Groundwater Study data could provide key information for a computer model describing groundwater movement and groundwater/surface water interactions in the Sammamish River Valley.	DNRP

KC Code Reference	Required Activity	Status of Activity	Providing Agency
King County G	King County Groundwater Policy		
	Participate in county activities and forums where groundwater protection may be a significant issue, in areas such as water resource inventory area work and Endangered Species Act work.	In 2002, the Groundwater Protection Program: Worked with Water Resource Inventory Area (WRIA) planning committees to identify and investigate groundwater-related aspects of salmon recovery; Used the Sammamish River Valley Groundwater Study in WRIA 8 to investigate relationships between groundwater and surface water flows and their role in providing beneficial environments for salmonids and other species; Began support of watershed planning efforts in WRIAs 7, 9, and 15, with emphasis on water quantity and water supply; and Supported Governor's Central Puget Sound Water Initiative, which aims to develop a regional approach to water resources management.	DNRP, DPH, DDES
9.14.030(H) 9.14.030(I)	Develop strategies to prevent contamination of sensitive aquifers. Participate in the protection and development of protection or remediation strategies for critical groundwater recharge areas.	Critical Areas Ordinance rewrite and subsequent building code (Title 21A)	DNRP, DPH, DDES
	Review and recommend health regulations related to groundwater protection.	Groundwater Protection staff and Public Health have initiated routine discussions regarding crossover issues. Public Health is exploring options for meeting its mandate under the GP Ordinance.	DNRP, DPH
	Recommend amendments to the countywide planning policies and environmental benchmarks related to groundwater protection.	Groundwater Protection staff are participating in the Critical Areas Ordinance rewrite and KC Comp Plan update. New Comp Plan policies have been proposed to provide additional protections for King County aquifers. The Council should receive recommendations sometime in 2003. Groundwater staff also believe the groundwater protection committees will play a role in recommending revisions to the Comp Plan and countywide planning policies in future years.	DNRP, DPH, DDES
	critical groundwater recharge areas.	Groundwater Protection staff have reviewed and commented on state legislation where groundwater issues were a concern; have worked with King County surface water staff on low-impact development revisions to the Surface Water Design Manual; and have studied surface water/groundwater interactions in the Sammamish River Valley.	DNRP, DPH, DDES
	tewardship and Education		
` '	Provide stewardship of groundwater in the unincorporated areas where stewardship services are not provided by special purpose districts, sewer and water utilities and associations, and water purveyors.	Stewardship activities range from basic education and public outreach to assistance with needs assessment and building code revision proposals. Program staff work with Rural Drainage Program staff where RDP and groundwater areas overlap.	DNRP, DPH

KC Code Reference	Required Activity	Status of Activity	Providing Agency
9.14.030(G)	Provide for regional education and public involvement in groundwater protection issues.	In 2002, the Groundwater Protection Program: Made presentations to more than 4,000 students in 51 schools in 12 school districts; Provided an education booth at 10 fairs and festivals; Provided technical presentations to several community groups; Received 7,395 hits (just over 20 hits per day) on website containing web-based materials and resources for teachers; and Conducted workshops and provided educational resources describing long-term maintenance of septic systems. Program staff currently are assessing the efficacy of their education and	DNRP, DPH
		outreach program.	
Interagency Co			
. ,	Oversee implementation of King County's Groundwater Protection Program.	This is done on a daily basis, though predominately through ad hoc communications. GP staff meet frequently with other agencies (DDES, DPH, other DNRP divisions). However, no formal structure (committee, panel, forum) has been developed for comprehensive program coordination. GP staff are attempting to rectify this issue.	DNRP
9.14.050(A.4)	Develop any combination of interlocal agreements, memorandums of understanding and operating agreements with cities, special purpose districts, sewer and water utilities and associations, and water purveyors for implementation of groundwater management plans and regional groundwater protection services in King County. These agreements shall include provisions addressing the scope, governance, structure, funding, and transition to implementation of certified groundwater management plans and regional groundwater protection services in King County.	Program staff are considering interlocal agreements in their ongoing effort to identify appropriate long-term funding. Some local jurisdictions have expressed interest in partnering with the County for plan implementation, and interlocal agreements likely would define these relationships. However, no interlocals have been developed to date.	DNRP, DPH
	Consult with the Washington State Department of Ecology about the feasibility of integrating the goals and implementation of certified groundwater management plans, where possible, with adopted watershed plans to avoid creating redundant work programs.	Program staff have worked with the DOE staff person for WRIA 15, which includes Vashon-Maury Island. This is the only KC WRIA currently planning under state law for which DOE has responsibility. Program staff also have worked with DOE on regional water resource management strategies for the Snohomish/King/Pierce County area. Groundwater issues likely will be addressed as part of this effort.	
	Coordinate with the Department of Development and Environmental Services for any review required pursuant to K.C.C. Title 21A regarding land use, water use, environmentally sensitive areas and special district overlays, or the exercise of other authorities, that relate to groundwater protection.	GP and Public Health staff are assisting with ongoing permit review where groundwater protection is an issue. Staff also are participating in the rewrite of the County's Critical Areas Ordinance (a responsibility of DDES) and will assist with subsequent building code revisions (Title 21A) as appropriate.	
9.14.050(A.7)	Coordinate with the Seattle-King County Department of Public Health for work performed pursuant to the King County Board of Health Code Title 10, Solid Waste Handling; Title 11, Hazardous Chemicals; Title 12, Water; and Title 13, On-site Sewage; or the exercise of other authorities that relate to groundwater protection.	The Groundwater Protection Program contributed funding for a septic system database developed recently by Public Health (Title 13 work). Other coordination appears limited, though in recent discussions with program staff, Public Health agreed to establish implementation goals and objectives for its mandated groundwater activities.	DNRP, DPH, DDES

KC Code Reference	Required Activity	Status of Activity	Providing Agency
9.14.050(A.8)	Coordinate with the Office of Regional Policy and Planning (ORPP) for work performed pursuant to K.C.C. Title 20, Planning, or the exercise of other authorities, that relate to groundwater protection.	ORPP no longer exists. Most Title 20 functions (procedures for developing and maintaining the comprehensive plan, the countywide planning policies, basin plans, resource lands, and CARAs) related to groundwater have moved to DDES. Groundwater Protection staff have been working with DDES on the groundwater portion of the Critical Areas Ordinance rewrite and will assist with any building code revisions that accompany this effort. GP and Public Health staff also are assisting with comp plan updates relating to sole source aquifer policy, low-impact development policy, and exempt wells.	DNRP, DPH, DDES
9.14.050(A.9)	Coordinate internally within the Department of Natural Resources for work performed under K.C.C. Title 9, Surface Water Management, K.C.C. chapter 20.70, Critical Aquifer Recharge Areas and K.C.C. Title 28, Water Pollution Abatement and Wastewater Treatment, or the exercise of other authorities, that relate to groundwater protection.	The Groundwater Protection staff group includes representatives from the Water and Land Resources Division (WLRD) and the Solid Waste Division (SWD). Collection, management, and analysis of groundwater data takes place in the Science, Monitoring and Data Management unit of WLRD. WLRD, SWD, and the Groundwater Protection Program share the EQuIS database and support each other on technical issues, training, and data sharing. SWD employees also participate on the Groundwater Protection Committees. Because these units are functionally interwoven, coordination appears to occur on an ongoing, though primarily ad hoc, basis. Coordination with the Wastewater Treatment Division seems less defined.	
Program Admi	nistration and Accountability		
9.14.050(A.3)	Identify sources and methods of funding regional groundwater protection services and seek funding for these services.	In 2002, program staff worked with the Groundwater Protection Committees to identify and evaluate a variety of funding options for feasibility and appropriateness. Public Health and the state Department of Health also have been consulted. According to program staff, this evaluation has continued in 2003, with the objective of having a long-term funding strategy ready for submission to the County Council along with the 2005 budget. Staff have convened a focus group with representatives from each Groundwater Management Area to advise on funding preferences.	
9.14.050(A.10)	In consultation with the Department of Development and Environmental Services, the Seattle-King County Department of Public Health, the Office of Regional Policy and Planning, and divisions within the Department of Natural Resources, develop an integrated <i>annual work plan</i> that incorporates each of these agencies' work programs relative to groundwater protection and that delineates the groundwater protection services provided by King County. A draft annual work plan shall be submitted to any groundwater protection committee appointed by King County for their review and recommendations.	Groundwater Protection staff developed a draft work plan for 2003 in November 2002. A one-page summary outlining DNRP efforts was reviewed by the Groundwater Protection Committees. However, varied opinions regarding appropriate program direction have led to frequent revisions of this plan. Program staff have shared their work with Public Health; however, in the interest of developing consensus among key players first (DNRP, Public Health and the Groundwater Protection Committees), program staff been reluctant to involve other potential participants. A draft 2004 work plan also has been developed and shared with Groundwater Protection Committee leadership.	DNRP

KC Code Reference	Required Activity	Status of Activity	Providing Agency
9.14.050(A.11)	Develop a <i>three-year work plan</i> that identifies long-term needs for groundwater protection, in consultation with any groundwater protection committee appointed by King County, cities, special purpose districts, sewer and water utilities and associations, and water purveyors. The work plan should include an examination by the Seattle-King County Department of Public Health of the effectiveness of the current compliance methodology for violations of regulations governing operation, maintenance and repair of groundwater facilities by public water systems or individuals, and an examination of alternative compliance methodologies that provide for a hierarchy of responses to such violations (e.g. education, site visit, notification, fines, civil penalty, operating restrictions). The work plan shall include an examination of existing county fees or charges for groundwater testing that could reduce any current testing disincentives caused by unaffordability of those fees or charges.	program years in November 2002. However, in the absence of a long-term funding strategy, future resources for implementation are uncertain. In reviewing the proposal, the Groundwater Protection Committees felt it tried to do too much too quickly and requested revisions. A rewrite is currently underway. Program staff also have met with representatives from the Department of Public Health to discuss long-term groundwater protection strategies with that agency. Public Health has agreed to review its role and work more closely with program staff in planning for long-term implementation, subject to available staff resources.	DNRP
9.14.050(A.12)	Provide an <i>annual written report</i> on the groundwater protection program. This report shall include, but not be limited to, information from the prior calendar year on groundwater protection services provided by King County, expenditures for the groundwater protection program and recommendations from any groundwater protection committee appointed by King County. By March 31 of each year this report shall be submitted to the King County council and any groundwater protection committee appointed by King County.	2001 and 2002. Both were submitted to the Council on time and appear to be complete.	DNRP

Abbreviations

CAO	Critical Areas Ordinance
CARA	Critical Aquifer Recharge Area
DDES	King County Department of Development and Environmental Services
DNRP	King County Department of Natural Resources and Parks
DOE	Washington State Department of Ecology
DOT	Washington State Department of Transportation
DPH	Seattle-King County Department of Public Health
GP	Groundwater Protection
GPP	Groundwater Protection Program
GWMA	Groundwater Management Area
ORPP	King County Office of Regional Policy and Planning
RDP	King County Rural Drainage Program
SWD	Solid Waste Division of DNRP
USGS	United States Geological Survey
VMI	Vashon-Maury Island
WLRD	Water and Land Resources Division of DNRP
WRIA	Water Resources Inventory Area